

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE:)	BANKRUPTCY CASE
)	
MANUEL HARO, JR.,)	NO.: 21-14035
LORENA HARO,)	
)	CHAPTER 13
Debtors,)	
)	JUDGE: TIMOTHY A. BARNES
)	

AMENDED OBJECTION TO CONFIRMATION OF DEBTORS' CHAPTER 13 PLAN

Now comes US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust, by and through its attorneys, McCalla Raymer Leibert Pierce, LLC, and requests that Confirmation be denied, stating as follows:

1. On December 11, 2021, the Debtors filed the instant bankruptcy petition under Chapter 13 of the Bankruptcy Code (11 U.S.C. Sec. 1301 et seq.)
2. US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust services the mortgage lien on the real property commonly known as 8903 Village Sq Lane, Brookfield, Il 60513.
3. US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust is preparing to file a claim secured by an interest in the real property located at 8903 Village Sq Lane, Brookfield, Il 60513.
4. The proof of claim that US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust intends to file includes an estimated pre-petition arrearage in the amount of \$51,600.27.
5. However, Part 3.1 of the Debtors' Chapter 13 plan provides for payment of \$49,929.00 in pre-petition mortgage arrears over the life of the plan, which contravenes US Bank

Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust's rights under 11 U.S.C. §1322(b)(2) and/or §1322(b)(5).

6. Additionally, given that the estimated arrears are higher than provided for in the plan, the plan raises feasibility issues.
7. Therefore, sufficient grounds exist for the denial of confirmation as Debtors' plan is unfeasible and fails to cure the pre-petition arrears due to US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust.

WHEREFORE, US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust respectfully prays that Confirmation of the Debtors' Chapter 13 Plan be denied, and for such other and further relief as this Honorable Court deems just.

Respectfully Submitted,

US Bank Trust National Association,
Not In Its Individual Capacity But
Solely As Owner Trustee For VRMTG
Asset Trust

/s/ Kinnera Bhoopal

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